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June 8, 2018

Via ECFS

Notice of Ex Parte

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Promoting Investment in the 3550 – 3700 MHz Band*, GN Docket
No. 17-258

Dear Ms. Dortch:

On June 6, CenturyLink met by telephone with Jessica Greffenius, Rebecca Iafrati, Gary Michaels, Heather Moelter, Matthew Pearl, Paul Powell, Becky Schwartz, Christiaan Segura, and Colin Williams of the Wireless Telecommunications Bureau, and Navid Golshahi and Bob Pavlak of the Office of Engineering & Technology. Participating for CenturyLink¹ were Jeb Benedict, Mike Elford, Stewart Gormley, and Tiffany Smink.

CenturyLink highlighted the potential of 3.5 GHz spectrum as an opportunity to supplement wireline networks to deliver cost-effective broadband service to high-cost, low-density rural areas. It described its current testing involving technology based on this spectrum band.

The company also discussed the recent compromise proposal filed by the CBRS Coalition.² It supported the coalition and the wide range of parties that agree on the importance of making licenses available for rural census tracts, but CenturyLink explained how the coalition's proposal should be modified to ensure 40 MHz in licensed spectrum on a census-tract basis is available for rural use. The coalition's compromise of 20 MHz would simply allow too little guaranteed bandwidth to enable robust broadband service in rural areas based on CenturyLink's advanced testing with the latest technology.

¹ This notice of ex parte is submitted on behalf of CenturyLink, Inc. and its subsidiary entities that provide communication services using fixed microwave facilities.

² Ex Parte letter from Barry J. Ohlson, Cox Enterprises, Inc., *et al.*, on behalf of the CBRS Coalition, to Marlene H. Dortch, FCC, filed herein (May 9, 2018).

Marlene H. Dortch, Secretary
Federal Communications Commission
June 8, 2018
Page 2

CenturyLink also explained why county-wide licenses would render rural use uneconomic. In a given county there can be specific rural areas for which census-tract based licenses would permit targeted coverage with a fixed wireless service to those rural areas. But, a county-based license for the same area would also include or be adjacent to a non-rural area that would not be an area where it would make economic sense to deploy this service. In turn, buildout requirements for the county-based license would render the license uneconomic for accomplishing the more targeted rural deployment desired. If the Commission is to meet its critical goal of ensuring access to broadband service for all Americans, including those living and working in rural areas, and also promote innovative and more efficient use of limited spectrum nationwide, it should make the most of this unique opportunity. It should ensure sufficient and cost-effective licenses are available for use in rural areas and for a wider range of bidders and applications.

Pursuant to section 1.1206(b) of the Commission's rules, this notice is being filed in the above-referenced docket. Please do not hesitate to contact me with any questions regarding this matter.

Respectfully,

/s/ John E. Benedict

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